

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:	:	
	:	Chapter 13
PIERRE R PAUL	:	
	:	Case No. 20-14528-MDC
Debtor.	:	

MOTION OF DEBTOR TO APPROVE PARTIAL CLAIM

PIERRE R PAUL (the “Debtor”), by and through their undersigned counsel, hereby submits this Motion to Approve Partial Claim with the U.S. Department of Homeland Security (“HUD”), serviced by Midland Mortgage (“Midland”), and in support thereof respectfully states the following:

1. The Debtor filed a voluntary petition for relief under chapter 13 of the bankruptcy code on November 23, 2020 (the “Petition Date”).
2. The Debtor owns real property located at 7517 Mayland Street, Philadelphia, PA 19138 (the “Property”).
3. The Property is encumbered by a mortgage held by MidFirst Bank in the approximate amount of \$156,860.57 (the “First Mortgage”).
4. On or about July 31, 2023, HUD, by and through Midland, offered the Debtor a partial claim in the amount of \$15,089.31 (the “Partial Claim”). See Exhibit “A.”
5. The Partial Claim shall act as a subordinate, interest free loan to the First Mortgage, to be paid at either (a) the payoff or refinance of the First Mortgage; (b) sale of the Property; or (c) maturity of the First Mortgage.
6. The Partial Claim shall cure any post-petition mortgage arrears—if any—owed on the First Mortgage as of September 1, 2023.

7. The Partial Claim will not impose any undue burden on the Debtor, and will not prejudice the Debtor, the chapter 13 trustee, or any of the Debtor's creditors.

WHEREFORE, the Debtor respectfully requests this Honorable Court enter an Order approving the Partial Claim, and for such other and further relief as the Court deems just and appropriate.

Respectfully submitted,

Dated: August 1, 2023

/s/ Brad J. Sadek

Brad J. Sadek, Esquire
Sadek Law Offices
Two Penn Center
1500 JFK Boulevard, Suite 220
Philadelphia, Pennsylvania 19102
(215) 545-0008
brad@sadeklaw.com

Counsel to the Debtor